

FCC MAIL ROOM

NOV 25 1996

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November 20, 1996

Secretary, FCC
1919 M. Street N.W.
Washington DC. 20554

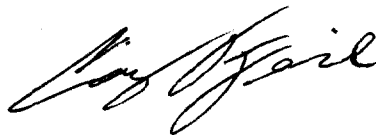
Ref.: docket number 87-268

Dear Sirs,

I am writing to you about an article in our local newspaper concerning the new rules proposed by the Federal Communications Commission. If they are approved, our area alone will have 100,000 people who will no longer be able to receive their television signals from translators. Fifty-two percent of the general population cannot get cable because they live in rural areas. I feel very strongly that the channels now used by translator television stations should remain available and not be given to the cellular phone companies. I understand that there is a provision in the plan that would allow translators to relocate on the spectrum, but there is really no place to go that wouldn't cause interference.

Please, just because the government can make a big profit on this, don't sell rural America out, we need our local translators.

Thank you for your time,



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Secretary
Federal Communications Commission
1919 M St.
Washington, DC 20554

Dennis C. Johnson
P.O. Box 626
570 North 200 East
Parowan, Utah 84761
(801) 477-8239

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November 18, 1996

Ref: MM Docket 87-268

Dear Sirs:

It is my understanding that the FCC is once again considering a spectrum recovery plan that includes the immediate elimination of UHF television channels 60-69 and again reducing the television spectrum in the future (channels 2-6 and 50-60). This letter is sent to express my deep concern and disapproval of any measure that would reduce the portion of spectrum currently used for over the air free television.

It is my opinion that the FCC has severely underestimated the impact that such a measure would have on the availability of the free television that is viewed in rural areas solely by the use of television translators. Such television translators have traditionally been viewed by the FCC as a secondary service and as undesirable and unnecessary. To those of us who live in rural America these translators are our link to our state and local governments, entertainment, sports, educational programming and news of local events as well as Emergency Broadcast signals etc.

It is my understanding that FCC estimates show impact and possible reductions of service as a result of this action at approximately 15%. It is my experience in Southern Utah that without rules and guidelines that would allow for re-channeling and reimbursement for cost related to re-channeling, such an action would reduce services provided through these translators by a figure likely in excess of 80%. It is also my estimate that costs to re-channel and relocate these services on a nationwide basis may far outweigh the 50-60 billion dollars expected to be claimed by the Federal government.

I would like to point out a case-in-fact to illustrate and qualify the above statements. As a part of my employment, I maintain eight translators in Southern Utah at a place called Frisco Peak. As a result of the first proposed spectrum recovery (channels 60-69) five of the eight will be displaced. This will result in the loss of input signals to translators in Millard, Iron, Beaver and Washington Counties. These are mountainous areas not capable of being served by existing broadcast stations. This loss includes feeds to 98 translators on 24 different sites, serving 60 different communities with a total of approximately

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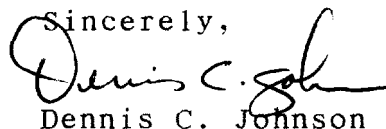
100,000 residents. The signals being lost are the local (Salt Lake City) ABC, NBC, CBS, and 2 PBS stations. I would also like to point out that these translator stations are the only feed of these local broadcast stations available to cable companies in these areas. Past efforts to license new services on Frisco Peak have shown me that it would be difficult, if not impossible to relocate all of the services currently provided through this facility and does not even attempt to address the costs involved in re-channeling the Frisco Peak translators and the resulting necessity of re-channeling all receive equipment on the sites that receive these signals. You should be able to see that the effects from changes required on this site alone will be tremendous. I would also like to point out that I'm personally aware of three other major translator sites within the state of Utah that will have similar resultant impacts.

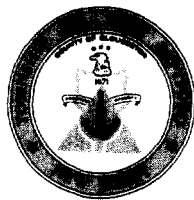
I feel it is imperative that as a minimum, the following considerations be given to the translator stations being impacted or displaced by the proposed FCC actions.

1. All translators impacted by the proposed spectrum recovery be allowed to be relicensed and relocated to alternate television channels that will allow complete coverage of all communities previously served.
2. All costs of re-channeling and relicensing be paid for by any alternate service that will benefit from the use of lost television spectrum.
3. Any spectrum recovery plan or sale of spectrum be delayed until full implementation, testing and proving of the proposed Digital television standard. Services to rural America should not be allowed to be lost as a result of these changes.
4. Spectrum should be set aside to allow for future expansion of television services to rural areas.
5. Congress and the FCC should recognize the necessity of television translator stations in serving rural areas where full broadcast stations are not available or economical. Translators are a vital part of communications in rural America and should be considered secondary only to full broadcast television stations in the VHF and UHF television bands. Any additional reduction of the broadcast television spectrum simply can not be tolerated.

Thank You for your consideration.

Sincerely,


Dennis C. Johnson



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WEST DEPTFORD TOWNSHIP

MUNICIPAL BUILDING
GROVE AVENUE AND CROWN POINT ROAD
THOROFARE, NEW JERSEY 08086

POLICE DEPARTMENT

Phone: 845-2300

FAX 853-2940

JOSEPH T. BUTTS, JR.
Chief of Police

ANNA DOCIMO
Director of Public Safety

November 6, 1996

Secretary, FCC
1919 M. Street NW
Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: Advanced Television Systems MM Docket
No. 87-268 and Their Impact Upon the
Existing Television Broadcast Service

Dear Chairman Hundt:

The West Deptford Township Police Department wishes to express its strong support for Federal Communications Commission action to reallocate the current UHF broadcast television channels 60-69, and make a portion of that spectrum available for public safety use. The first step in the process is reallocation of UHF channels 60-69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public safety radio channels. The Public Safety Wireless Advisory committee (PSWAC), co-sponsored by the FCC and the NTIA, recently released its final report which found that public safety agencies need at least 2.5 MHz of additional spectrum right now for interoperability, at least 25 MHz within five years, and an additional 70 MHz within the next fifteen years.

West Deptford Township Police Department agrees with the PSWAC findings. We believe more radio frequencies need to be allocated for police work due to crowded channels, use of mobile data terminals, and other new technology, we don't need less. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by West Deptford Township Police and many other public safety agencies around the nation.

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The spectrum within channels 60-69 is ideal for public safety use. This block of UHF channels is adjacent to the 800 MHz mobile radio frequencies heavily used by public safety agencies.

We also urge the commission not to eliminate use of Channel 20 for land mobile service in the Philadelphia region.

Elimination of any channel is going to result in more congestion on those channels remaining. In addition, relocation of affected services within an already congested spectrum region cannot be accomplished without further reducing frequency assignment options for present and future licensees. Additionally, we urge the commission not assign Channel 21 to the Philadelphia region as it would severely disrupt land/mobile operations with co-channel interference.

West Deptford Township Police urges the commission to act expeditiously and favorably in this matter.

Sincerely,



Joseph T. Butts
Chief of Police

srn

cc: Senator Bill Bradley
Senator Frank R. Lautenberg
Rep. Robert Andrews
Senator Raymond J. Zane
Assemblyman Gary Stuhltrager
Assemblyman Jack Collins
Freeholder Stephen R. Salvatore
Freeholder Daniel Mangini

TV CHANNEL 18

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Federal Communications Commission
1919 M. St.
Washington, D.C. 20554
Secretary of the Commission

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MM Docket No. 87-268

I would like to make comments on the proposed rule making MM Docket No. 87-268.

Low Power Television was envisioned as a means to allow the origin and rebroadcasting of television programming to an audience and provide that audience with a choice of the programs. In other incidences it may be their only means of receiving free television. Our station is in the rural community of Camp Verde, AZ and we are only means for the local community to take part in any TV on the local level. We have had talk shows with participants from all aspects of the community. The local school principal talked about drugs in the school and how they were trying to combat it. A symposium was taped on the programs and made available to the local battered women on how they could break free from the environment. Is this programming available from the big city full power stations? NO! They do not take the time to go into the small communities to take part in the local life. In fact, they take only a small part in the affaires of the community they broadcast from with any programming other than the news. Where we live in the Verde valley the weathermen from the Phoenix translators don't give our weather, they jump all around us, North, East, West. Yet, I have to compete with their translators bringing network programming into our area, which I'm happy to do.

What I am trying to say is, the local low power TV station provides a service not found in any other free TV programming medium. The local newspaper and radio station are probability the only other source of local contact, if one lives in the community.

Many L.P.T.V station owners have put their life savings into the equipment, buildings and tower space to be of service to their fellow man and this may all come to a full stop.

I understand that about one-third of all the L.P.TV's fall into the channel 60 to 69-slot! What will you do with this spectrum if you displace these stations? Sell it to the highest bidder! And who will bid on it? Only big business will have the money!

And as usual the public will take the loss. When we started our license cost \$495.00, the space for the tower at the Forest Service Electronic sight cost \$100.00 a year. Today I send to the FCC \$225.00 a year and the Forest Service \$1,400.00. The full power stations are spending up to \$65,000.00 a year and more depending on where there tower is located. Talk about not raising our taxes. The politicians have found more ways to take money out of our pockets than a pick pocket at the circus.

Getting back to the proposal. I would like to see the spectrum allotted for television stations not be shortened. I would like Low Power Stations to remain on the air, having first choice over translators (which only extend the full power stations range). I would like to see opportunity stay available for L.P.TV N.T.S.C. stations to go on the air now, not three to five years down the road. I believe people would make the Boston tea party look like a walk in the park, if the public knew that their old tapes, TV sets, camcorders and the new TV or camcorder they will get for Christmas will not be worth the cost of taking them to the dump if Digital TV were to start very soon. We know that will not happen because the time to make and sell the new equipment, build the stations, work out all the bugs will take time (10 to 20 years? More?) So why are we stopping the process today when the people who will be promoting this cannot agree on how to do it?

The free broadcast of TV is being picked out to feel the full weight of a process supposed to give us a theater like a picture. I cannot believe that this is the real reason for all this rule making! There is to be big bucks to be had by everyone that makes equipment. I have heard it may take hundreds of thousands of dollars to change over a station to HD. One of the full power stations manager told me he was putting one million in the budget for HD. Even the utilities will get their share when two transmitters are running. Sales tax, property tax, rent, utilities, and this are only the beginning. This one change will cost citizens billions in the long run. Is it worth all the fuss and cost for a better picture of all the violence and sex we have to look at today? Our station does not show any of this type programming. I had one mother tell me she could let her child watch any of our programming without concern because she knew we were the CLEAN BEAM TELEVISION STATION. YES THIS IS THE TYPE OF STATION THAT MAY HAVE TO GO OFF THE AIR SOMEDAY.

I believe if manufacturers were given information needed to build TV products that can receive NTSC and HD signals and a date in which to do so, they would start a process to have a complete and orderly change over. If a set could receive both NTSC and HD

TV the market would demand which product was broadcast. In our part of the state where there are many families living on social security or minimum wage the change over would take some time. In large affluent communities the change over could be sooner. Remember when UHF tuners were to be a part of all new sets? Why require two signals be broadcast at the same time? Let me choose which one I need for my family and when to make a change.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Young', written over a horizontal line.

George Young
owner



MAKAH TRIBAL COUNCIL

P.O. BOX 115 • NEAH BAY, WA 98357 • 360-645-2201



IN REPLY REFER TO:

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November 19, 1996

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Secretary
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

Ref: MM Docket 87-268

Dear Mr. Secretary:

I am writing on behalf of the Makah Tribal Council, the Makah Indian Reservation and the Makah People to express my concern about the Federal Communications Commission's (FCC) consideration of taking channels 60-69 out of the TV band.

Located in Neah Bay, Washington, the Makah Tribal Council is a remote community not serviced by a formal TV Cable Company. We currently receive microwave feed of four (4) local TV stations out of Seattle Washington, about 150 mile to the east of where we are located. These 4 TV stations are rebroadcast through TV translators into our community on UHF channels. We are currently in the process of trying to expand the number of TV stations that we rebroadcast into the community to seven (7) using the UHF channels. We need more UHF TV bands, not less.

My concern is that by taking channels 60-69 out of the TV band, this would adversely affect both the current and future quality of TV in our community, since we are not served by a local cable television company, and we rely upon the UHF channels to get local Seattle area TV.

Sincerely,

Hubert Markishtum

Chairman

MAKAH TRIBAL COUNCIL

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